

**IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT
OF ALABAMA, NORTHERN DIVISION**

Deloise Price,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION NO. 2: 06 cv721-MHT
)	
Wal-Mart Stores, Inc.,)	
Extreme Performance, Inc.,)	
)	
Defendants.)	

PLAINTIFF'S VOIR DIRE

The Plaintiff submits the following proposed voir dire:

1. Do any of you have any knowledge whatsoever of Dennis Bailey or the law firm of Rushton, Stakely, Johnston & Garrett?
2. Have any of you, your friends, or relatives been represented by any of these lawyers or this firm?
3. Have you or any member of your family been employed in a law firm?
4. Have any members of your family been employed by Wal-Mart?
5. Do any of you have any personal knowledge of any close friend who works for Wal-Mart?
6. Has any business that you own ever been sued?
7. Has any business where you worked ever been sued? If so, were you involved as a witness?

8. Have any of your family members or kinfolks been sued as defendants in a civil lawsuit before (not including domestic or divorce)?
9. Have any of you, or any member of your family, ever worked as a claims adjuster or worked in a job which required you to determine and establish the value of claims?
10. Have any of you ever seen, read or heard any TV news reports or read any newspapers, books or magazines or listened to any radio shows regarding the subject of tort reform or any other such issues involving our justice system that would interfere or prejudice your ability to fairly decide a case such as this that may involve the award of punitive damages?
11. Are each of you willing to impose and award compensatory damages in an amount adequate to fully, completely, and totally compensate Deloise Price if the law and facts justify it?
12. Does anyone here feel that they could not award damages in a case such as this? That is, damages imposed against a defendant to compensate the Plaintiff?
13. Are any of you against the awarding of damages for pain and suffering in any amount for any reason or for no reason? In other words – you just don't believe pain and suffering damages should ever be awarded against any defendant.
14. Does anyone believe that they could not award substantial compensatory damages even if the facts and law warrant it?
15. Are any of you just opposed to the jury system? In other words, you just don't think it works very well?
16. Is there anybody who is opposed to the constitutional right of trial by jury?
17. Is there anyone that believes that lawsuits are out of control?

18. Is there anyone that believes that a person, if he feels that he or she has been the victim of negligence, should not have the right to bring a case such as this and have a jury decide the issues of liability and damages?

19. Is there anyone that feels that they cannot be fair and impartial for some reason, but would be more comfortable discussing it with me and the attorneys at sidebar?

RESPECTFULLY SUBMITTED, this 12st day of November, 2007.

Respectfully Submitted,

/s/ Brian Strength
BRIAN P. STRENGTH (STR052)
Attorney for Plaintiff

OF COUNSEL:

COCHRAN, CHERRY, GIVENS
& SMITH
Post Office Box 830419
Tuskegee, Alabama 36083
Tel: (334) 727-0060
Fax: (334) 727-7197

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon counsel listed below by electronic notification on this the 12th day of November, 2007;

Dennis Bailey
Rushton, Stakely, Johnston & Garrett, P.A.
Post Office Box 270
Montgomery, AL 36101

/s/ Brian P. Strength
OF COUNSEL